



**B&C Dairy**  
**Curtis and Carlene Weitzel**

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May 15, 2005

National Organic Standards Board  
c/o Arthur Neal  
Room 4008 - South Building  
1400 and Independence Avenue SW  
Washington, DC 20250-0001

Dear Mr. Arthur Neal:

I am writing in response to the NOSB "Guidance for Interpretation of section 205.239(a)(2) of the National Organic Program, published for public comment on March 22.

I am against part of the phrasing in Sections (A) and (C), but I am in favor of Section (B).

I am greatly concerned about how the restrictions in Sections (A) and (C) could affect the progress of organic dairies in my area and potentially put some of them out of business. This could have a large, negative impact on my ability to raise quality organic replacement heifers if these dairies are lost. In addition, I want my organic operation to continue to grow in the future and if these restrictions are put into place I think they could really hurt my operation and many other organic operations in the area.

In Section (A), I am against two parts of the wording. First, I disagree with the numerical requirements of thirty percent dry matter intake daily during the growing season, but not less than 120 days. It has been my experience that it is impossible to measure the amount of dry matter that the cattle will consume from pasture on a daily basis, especially if they are being supplemented with other feed. Also, there are many different climates, soils, and farm management plans that many farms may not be able to fulfill the requirements of these restrictions. I feel that each farm should be able to develop their own farm plan that upholds all of the organic standards and works well for that particular area. Second, I disagree with the five reporting requirements of this section. Organic producers already have a great deal of paperwork to verify how the farm is managed; the extra record-keeping required for this section would only add to the time-consuming reporting. The additional records that would be required are not useful or beneficial to livestock producers or the organic program.

In Section (C), I disagree with using the National Resource Conservation Service for regulating dairy animal grazing. In my county the NRCS has only been used for beef cattle, not for dairy cattle. The NRCS is not a good resource to manage dairy pasture because it is designed more for a cow/calf operation than for a dairy operation.

I feel that Section (B) is a good idea because dairy animals should be outside and should have access to pasture.

Thank you for your time.

Sincerely,

Curtis Weitzel

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